

**U.S. Department of Justice**

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

March 25, 2025

BY ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Michelle Bond, 24 Cr. 494 (GBD)*

Dear Judge Daniels:

On March 25, 2025, the Court adjourned the next status conference in this matter, with the consent of the parties, to July 14, 2025.

Accordingly, the Government respectfully requests, with the consent of defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through July 14, 2025. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial because it would allow the parties to produce and review discovery, to consider potential motion practice, and to engage in discussions regarding a potential resolution of the matter without the need for trial.

The Government respectfully encloses a proposed order excluding time for the Court's consideration.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

By: _____ /s/
Stephanie Simon
Assistant United States Attorney

cc: All counsel of record (by ECF)